

Scott Freeman MD et al. v. Stephen Hurst et al.

2:22-cv-01433-RFB-MDC

Stipulation and Order to Extend Briefing Schedule – Third Request

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10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 SCOTT FREEMAN MD, individually and as trustee
13 for THE SCOTT MITCHELL FREEMAN
14 REVOCABLE LIVING TRUST, DATED MARCH 10,
2012, for itself and as assignee of FERDINAND
15 BELGA,

Plaintiff,

16 *v.*

17 STEPHEN HURST; NICO FORTE; CERUVIA
18 LIFESCIENCES f/k/a CH TAC, LLC f/k/a
19 SAVANT TAC, LLC; CAREY TURNBULL;
20 RUSSELL BURBANK; BPM LLP; SAVANT HWP,
INC.; SAVANT HWP HOLDINGS, LLC; and
SAVANT ADDICTION MEDICINE, LLC,

21 Defendants,

22 *and*

23 SAVANT ADDICTION MEDICINE, LLC;
24 SAVANT HWP HOLDINGS, LLC; and SAVANT
HWP, INC.,

25 Nominal Defendants.

Case No. 2:22-cv-1433-RFB-MDC

**Stipulation and Order to Extend
Briefing Schedules – Third
Request**

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1 **WHEREAS**, on two occasions, the Court previously extended the time to the
2 below pleadings in light of the Parties' settlement negotiations. *See* ECF Nos. 208, 217.

3 **WHEREAS**, the undersigned parties are engaged in active settlement negotiations
4 to fully resolve all claims and defenses and desire to conserve resources during said
5 negotiations.

6 **WHEREAS**, Plaintiff and Defendant Hurst have discussed a general framework
7 for a settlement. On September 30, 2024, the parties set up a shared data room for
8 confidential documents to be exchanged for the necessary due diligence as part of the
9 settlement terms. Plaintiff has diligently reviewed these documents and exchanged multiple
10 follow-up questions and clarification emails with Defendant Hurst and Defendant Burbank.
11 Due to the complex nature of these financial documents, Plaintiff is continuing his review
12 to determine if the parties' general framework for settlement is feasible. If so, the parties
13 intend to negotiate a global settlement with all parties. To facilitate these settlement
14 negotiations, the Parties have agreed to extend the stay of discovery (pending Court
15 approval) by an additional 30 days, and the Parties similarly wish to continue conserving
16 resources related to the below briefing schedule for the same reasons.

17 The undersigned parties therefore present the following proposed schedule.
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1 **IT IS HEREBY STIPULATED AND AGREED**, by and between the
 2 undersigned parties, by and through their respective counsel of record, that they will adhere
 3 to the revised briefing schedule set forth below:

Event	Current Date (ECF Nos. 217, 219)	New Date
Temporary Stay of Discovery	Oct. 17, 2024	Monday, November 18, 2024
Answer or Response to Third Amended Complaint for Savant LLCs	Oct. 21, 2024	Monday, November 18, 2024
Opposition to Motion to Disqualify	Oct. 28, 2024	Monday, November 18, 2024
Opposition to Nico Forte's Motion to Dismiss	Oct. 28, 2024	Monday, November 18, 2024
Opposition to Ceruvia and Turnbull's Motion to Dismiss	Oct. 28, 2024	Monday, November 18, 2024
Response, Answer, and/or other Motions related to Hurst's Counterclaim	Nov. 4, 2024	Friday, November 29, 2024

18 **IT IS FURTHER STIPULATED AND AGREED**, by and between the
 19 undersigned parties, and through their respective counsel of record, that any reply briefs
 20 associated with the extended deadlines will be filed on or before December 16, 2024.

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Respectfully submitted this 15th day of October 2024.

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ORDER

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE/
UNITED STATES MAGISTRATE
JUDGE

Dated: 10-16-24

Case No.: 2:22-cv-01433-RFB-MDC

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of October 2024, a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND BRIEFING SCHEDULES - THIRD REQUEST** was served by the following method(s):

- ☒ **Electronic:** by submitting electronically for filing and/or service with the United States District Court District of Nevada's e-filing system and served on counsel electronically in accordance with the E-service list to the following email addresses:

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